

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**WILLIAM JOSEPH WEBB JR.,
Plaintiff,**

v.

**FIRST CORRECTIONAL MEDICAL,
ET.AL.,
Defendants.**

CIV. ACT. NO. : 07-31-GMS

JURY TRIAL REQUESTED

**MOTION FOR REINSTATEMENT OF DEFENDANT,
FIRST CORRECTIONAL MEDICAL.**

Comes now, Plaintiff William Joseph Webb Jr. in presenting His Motion to Reinstatement of Defendant, First Correctional Medical for the good cause shown and excerpts of law:

1. First Correctional Medical was terminated from the proceedings without notification to Plaintiff.
2. First Correctional Medical falls under the jurisdiction of this Court where it had an office address in the State of Delaware (243 McKee Road, Dover, Delaware 19904) at the time the incidents occurred arising to constitutional violations that have deemed to pass the initial muster for the Court to order Service of the Complaint for Defendants to answer.
3. 28 U.S.C. § 1391 (a) (2) states: "a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred,...."
4. 28 U.S.C. § 1391 (b) (2) states: "a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred,...."
5. The State defendants and its codefendants have tried to use the lack of personal jurisdiction over defendants as a defense where it is clear that the State of Delaware has had contact with "FCM" where they hired "FCM" to be their medical health care provider for the State prison system.

6. The Court has jurisdiction over Plaintiff's claims and the defendant "FCM" due to they had an actual presence in the State of Delaware not just a business license.
7. The Plaintiff has shown just cause for "FCM" to be reinstated to the proceedings.

RELIEF:

The Court exercise its jurisdiction over "FCM" and have them answer to the complaint or be found in default with being held liable without the benefit of a jury trial or much less a defense.

Respectfully Submitted,



Dated: August 13, 2007

William Joseph Webb Jr.
#256056 / D/E F17T
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, William J. Webb Jr. hereby certify that I have served a true and correct cop(ies) of the attached Motion Upon the following parties/persons:

To: Eileen Kelly
820 North French Street
Wilmington, DE 19801

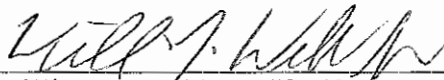
To: Patrick G. Rock
913 Market Street
Suite 800
Wilmington, DE 19801

To: First Correction Medical
205 W. Giaconda Way
Suite 115
Tucson, AZ 85704

To: Dr. Ali
1181 Paddock Road
Smyrna, DE 19977

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 13 day of August, 2007

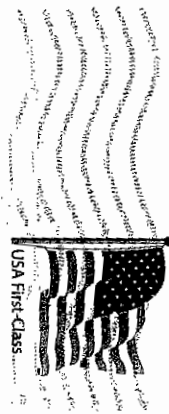


William J. Webb Jr. #256056

IM William Joseph Wells Jr
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